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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 16-00440 WHA
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	EXCLUDING TIME FROM APRIL 17, 2018,
v.	)	THROUGH JUNE 26, 2018.
	)	
YEVGENIY ALEXANDROVICH NIKULIN,	)	
	)	
Defendant.	)	
	)	
	)	

Defendant Yevgeniy Nikulin, represented by Arkady Bukh and Valery Nechay, and the United States, represented by Assistant United States Attorneys Michelle J. Kane and Matthew A. Parrella, hereby stipulate to the following:

1. The parties appeared before the Court on April 17, 2018, for a status conference;
2. The Court set the next appearance in the case on June 26, 2018, at 2:00 p.m. for trial setting;
3. The Court, with the agreement of the parties, designated the case as complex based on the nature of the prosecution, pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii);

STIPULATION & ~~PROPOSED~~ ORDER  
CR 16-00440 WHA

1           4.       The parties agreed that the time until the next appearance was necessary for effective  
2 preparation of counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv);

3           5.       The government and defense therefore agreed that the time between April 17, 2018, and  
4 June 26, 2018, is necessary based on the nature of the prosecution and for effective preparation of  
5 counsel, taking into account the exercise of due diligence, and that the ends of justice served by  
6 excluding the period from April 17, 2018, through June 26, 2018, from Speedy Trial act calculations  
7 outweigh the interests of the public and defendant in a speedy trial, in accordance with 18 U.S.C.  
8 § 3161(h)(7)(A) and (B).

9 IT IS SO STIPULATED.

10 DATED: April 20, 2018

Respectfully submitted,

11 ALEX G. TSE  
12 Acting United States Attorney

13 /s/  
14 MICHELLE J. KANE  
15 MATTHEW A. PARRELLA  
16 Assistant United States Attorneys

17 /s/  
18 ARKADY BUKH  
19 Counsel for Yevgeniy Alexandrovich  
20 Nikulin

21 /s/  
22 VALERY NECHAY  
23 Counsel for Yevgeniy Alexandrovich  
24 Nikulin


## ORDER

25       Based upon the representations of counsel at the April 17, 2018, hearing, and for good cause  
26 shown, the Court finds that the case is complex based on the nature of the prosecution. 18 U.S.C.  
27 § 3161(h)(7)(B)(ii). The Court also finds that failing to exclude the time between April 17, 2018, and  
28 June 26, 2018, would unreasonably deny the defendant the reasonable time necessary for effective

1 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court  
2 further finds that the ends of justice served by excluding the time between April 17, 2018, and June 26,  
3 2018, from computation under the Speedy Trial Act outweigh the best interests of the public and the  
4 defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between April 17, 2018,  
5 and June 26, 2018, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §  
6 3161(h)(7)(A) and (B)(ii), (iv).

7 IT IS SO ORDERED.

8 Dated: April 20, 2018.

  
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HON. WILLIAM ALSUP  
United States District Judge